

7011 Main Street, Frisco, TX 75034 214.984.3410 · www.FreemanLaw.com

Jason B. Freeman, Founding Member

Mr. Freeman is the founding and managing member of Freeman Law, PLLC. He is a dual-credentialed attorney-CPA, author, law professor, and trial attorney. Mr. Freeman has been named by Chambers & Partners as among the leading tax attorneys in the United States and to U.S. News and World Report's Best Lawyers in America list. He is a former recipient of the American Bar Association's "On the Rise – Top 40 Young Lawyers" in America award and was named the "Leading Tax Controversy Litigation Attorney of the Year" for the State of Texas for 2019 and 2020 by AI.

Mr. Freeman is a Forbes contributor for tax and white-collar law and serves as an adjunct professor on the law school faculty at SMU's Dedman School of Law, where he has taught a course in the law of federal income taxation for 10 years. Mr. Freeman is a frequent public speaker across the country, presenting and educating on various legal topics. Mr. Freeman is the former chairman of the Texas Society of CPAs (TXCPA), as well as a former chairman of the Dallas Society of CPAs (TXCPA-Dallas). Mr. Freeman also served multiple terms as the President of the North Texas chapter of the American Academy of Attorney-CPAs and multiple terms as a council member for the Tax Section of the Texas State Bar.

Mr. Freeman represents clients in litigation and disputes, with a particular focus on federal and state tax controversies, as well as white-collar and financial disputes, both civil and criminal. He handles IRS audits and other investigations, and represents clients facing tax and white-collar or financial- related charges. He also advises and assists clients with tax and regulatory compliance, including domestic and international tax planning and regulatory reporting requirements.

Honors and Awards

- Chambers & Partners, Best Lawyers in America, 2020-23 (tax litigation and tax fraud defense).
- U.S. News and World Report's Best Lawyers in America, 2020-2024
- Tax Controversy Litigation Attorney of the Year for the State of Texas, Al 2019, 2020.
- "On the Rise Top 40 Young Lawyers" in America Award
- Best Lawyers in Dallas, D Magazine, 2015-2023 (Tax, Tax Litigation, White-Collar Defense)
- Super Lawyer, Tax Law, 2019-2024 Super Lawyers Magazine
- Leadership Dallas Alumni
- CPA of the Year, TXCPA Dallas. 2023
- JD Supra Readers' Choice Top Author (No. 1) in Tax, 2023
- Mondaq Thought Leadership Award Recipient, 2023
- Martindale-Hubbard AV, Peer Rated for Highest Level of Professional Excellence
- 40 Under 40, Dallas Business Journal, 2018
- Young CPA of the Year Award, Texas Soc. of CPAs Dallas Chapter, 2019
- Super Lawyers Rising Stars, 2014-2017, Tax Law, Super Lawyers Magazine
- Young CPA of the Year Award, 2015, Texas Society of CPAs
- Rising Star 2664 5: 22 Star Colon Colon Brown Document 166-1 Filed 04/04/24 Page 1 of 8



Jason B. Freeman, J.D., CPA

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Jason@FreemanLaw.com

Practices

- Tax Litigation
- Criminal Tax & White-Collar Defense

Education

The University of Texas School of Law, Austin, Texas

J.D. with High Honors Order of the Coif Dean's Award Recipient

Texas International Law Journal

The University of Texas at Austin P.P.A. Program—Joint B.B.A. and M.A. in Professional Accounting

Bar Admissions

- U.S. Supreme Court; State Bar of Texas
- U.S. Court of Appeals for the Third,
 Fifth and Seventh Circuits
- U.S. District Court for the Northern, Southern, Western and Eastern Districts of Texas
- U.S. Tax Court



Professional Memberships and Affiliations

- American Association of Attorneys-CPAs
 - President of North Texas Chapter (Past)
- American Bar Association Section of Taxation
- State Bar of Texas, Section of Taxation
 - Tax Council Member (Past)
 - Co-Chair of the Committee on Government Submissions (Past)
 - State Bar of Texas Tax Section Leadership Academy (Past)
- Dallas Bar Association
 - Tax Council (Past)
 - Co-Chairman of the Bench Bar Conference Committee (Past)
 - DBA Judiciary Committee (former member)
- American Institute of Certified Public Accountants
 - Tax Practice and Procedures Committee
 - Tax Legislation and Policy Committee (former member)
- Texas Society of CPAs
 - Past Chairman
 - Member of Executive Board of Directors (2016 2019)
 - Director at Large (2014 2016)
 - Editorial Board
 - Federal Tax Policy Committee
 - Legislative Advisory Committee (2015 2016)
- Dallas CPA Society
 - Past chairman

Publications

- Choice of Entity After Tax Reform, Todays CPA Magazine, July 2022
- IRS Intends to Audit More High-Wealth Taxpayers, Forbes, June 2022
- Everything PPP Borrowers Need to Know About Why The SBA's 75% Rules is Wrong, Forbes, May 2022
- IRS Intends to Audit More High-Wealth Taxpayers, Forbes, June 2020
- Everything PPP Borrowers Need to Know About Why the SBA's 75% Rule Is Wrong, Forbes, May 2020
- SBA Issues PPP Loan Forgiveness Guidance, A Few New Rules: What You Need to Know Now, Forbes, May 2020
- SBA Issues PPP Loan Forgiveness Guidance, A Few New Rules: What You Need To Know Now, Forbes, May 2020
- PPP Borrowers and False Certifications: SBA Extends Amnesty Under Safe harbor, Forbes, May 2020
- PPP Borrowers And False Certifications: SBA Extends Amnesty Under Safe harbor, Forbes, May 2020
- Congressional Leaders Tell Treasury That PPP Borrowers Should be Entitled to Deductions Forbes, May 2020
- Should Employers Get a Tax Opinion For Paid Sick Leave Credits? Forbes, May 2020
- U.S. Government Continues to Crack Down on Reported Offshore Bank Accounts, Forbes, April 2020
- PPP Lawsuits Allege Banks Favored Larger Customers, A Second Round OF Funding Likely, Forbes, April 2020
- Ready. Set. GO. Small Business and The Race for Round 2 PPP Funds, Forbes, April 2020
- Why the SBA's New Self-Employed PPP Guidance Got IT Wrong, Forbes, April 2020
- Self-Employed and Need a PPP Loan? The SBA Just Issued New Guidance for You, Forbes, April 2020





- Reviving An Economy And A Sense OF Hope: A Post-Covid-19 World, Forbes, April 2020
- The Word 2.0: Is Coronavirus The Great Disrupter? Forbes, April 2020
- PPP Loan: Do Private Equity and Venture Capital Backed Companies Qualify? Forbes, April 2020
- Five Things Every Paycheck Protection Program Borrower Should Do After Receiving a Loan, Forbes, April 2020
- Flattening The Economic Curve: The High Points Of Coronavirus Tax Relief, Forbes, April 2020
- Choice of Entity After Tax Reform, Today's CPA Magazine, March 2018
- Tax Reform is Here: A Brief Primer on the Key Business Provisions, Today's CPA Magazine, May 2018
- Bitcoin, Blockchain, and the Revolution to Come, Today's CPA Magazine, January 2018
- A Primer on the Tax Implications of Settlements and Judgments, Dallas Bar Association Headnotes, December 2017
- Held Captive: Micro-Captive Insurance in the Aftermath of Abrahamic, Today's CPA Magazine, November 2017
- IRS Penalties A Brief Primer, Today's CPA Magazine, September 2017
- Employment Tax Enforcement Rising to a Top Priority, The Journal of Accountancy, July 2017
- Employment Tax Enforcement is Trending, The Tax Advisor, AICPA, July 2017
- Representing Taxpayers in Sensitive Audits: A Look at the Fundamental Challenges of an Eggshell Audit, Today's CPA Magazine, July 2017
- Partnership Tax Audits: The New Rules, AICPA Tax Section Publication, May 2017
- Why (Nearly) Every Partnership Agreement Should be Amended, Today's CPA, May 2017
- Foreign-Owned Domestic Disregarded Entities: The New Reporting Requirements, The Tax Advisor, AICPA, April 2017
- An Update on International Tax Enforcement, Today's CPA, March 2017
- Tax Reform Under a Trump Administration, Today's CPA, January 2017
- Employment Tax Enforcement is on the Rise, Today's CPA, November 2016
- A Glimpse into the New Partnership Audit Rules, AICPA, The Tax Advisor, October 2016
- Bitcoin and Beyond: The Reality of Taxing and Regulating Virtual Currency, Today's CPA, September 2016
- A Brave New World: The Panama Papers and the United States Role as a Tax Haven, Today's CPA, June 2016
- Electing out of the BBA Partnership Rules, AICPA Tax Section, June 2016
- Internet Tax Freedom: State Taxation and the Internet, Today's CPA, May 2016
- The Evolution of Partnerships and Partnership Audits, Today's CPA, March 2016
- The IRS Budget: Taking Stock, Today's CPA, January 2016
- The New Highway Trust Fund Bill Paves the Way for Major Tax Compliance and Return Due Date Changes, Today's CPA Magazine, November 2015
- The U.S. and BEPS: Hurry Up and Slow Down, Today's CPA Magazine, September 2015
- A Look Back at More than a Century: The Federal Income Tax, Today's CPA, July 2015
- One Step Forward and Two Steps Back: Identify Theft and Taxes, AICPA Tax Section, June 2015
- Guiding Clients Through the Offshore Voluntary Disclosure Program, The Tax Advisor, AICPA, April 2015
- The Perfect Storm: Has the Tide Turned Against Offshore Tax Evasion?, The Texas Tax Lawyer, Winter 2015 Ed., Vol. 42, No. 2, Part 1, March 2015
- The Taxpayer Advocate Service: Taxpayers' Voice at the IRS, AICPA Tax Section Newsletter, February 2015
- The Perfect Storm: Has the Tide Turned Against Offshore Tax Evasion?, Today's CPA, January 2015 (Cover Story)
- Voluntary Disclosures and Streamlined Relief, Meadows Collier Newsletter, November 2014
- Funding the Taxman—A Brief Foray Into the IRS Budget Debate, AICPA Tax Section Newsletter, October 2014
- Uncle Sam Wants You—To Pay Your 3.8 Percent Tax On Net Investment Income!, Meadows Collier Newsletter,
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December 2013

- What Role Should the Guidelines Play in Sentencing White-Collar Offenders?, ABA White Collar Crime Newsletter, Winter 2013 Edition
- Five Things (and Then Some) Every Lawyer Should Know About Tax Law, Texas Young Lawyers Association E-Newsletter, August 2013
- Five Things Every Lawyer Should Know About Tax Law, Headnotes, Dallas Bar Association, August 2013
- There's a First Time for Everything: First-Time Penalty Abatements—What They Are and Why You Should Care,
 Texas Society of Certified Public Accountants E-Newsletter, July 2013
- Time Sensitive: Preserving More Favorable Franchise Tax Deductions Through Protective Refund Claims, Meadows Collier Newsletter, March 2012
- No Good Deed Goes Unpunished The Limitations and Pitfalls of Tax Code Driven Investment in the U.S. Virgin Islands, Journal of Tax Practice & Procedure, February – March 2012



Speaking Engagements

- "Public Accounting & Industry CPA" Dallas CPA Society Young Professionals Group Dallas, TX August 21, 2019
- "Ethics for Tax Lawyers" Advanced Tax Law Texas Bar CLE presents the 37th Annual Course, Houston, TX -August 1, 2019
- "Blockchain, Bitcoin and Cryptocurrency The Tax and Regulatory Issues" Tax Alliance Conference, Plano, TX June 5, 2019
- "Creative LLC Acquisition Techniques for Maximizing Bonus Depreciation and 20% Deduction Benefits Texas Bar CLE presents the 17th Annual Choice, Governance & Acquisition of Entities Course, Dallas, TX- May 24, 2019
- "International Tax Law" Tax Law in a Day State Bar of Texas, Dallas, TX -January 25, 2019
- "Blockchain and Cryptocurrency The Technology and Reporting Issues –TSCPA CPE presents the 65th Annual Texas CPA Tax Institute, Addison, TX – November 15, 2018
- "Blockchain for Accountants The Technology and Tax Issues"; "Business Implications of the Tax Cuts and Jobs Act of 2017"
 Oklahoma Society of CPAs, Oklahoma City, OK September 19, 2018
- "Bitcoin/Cryptocurrency An Introduction, and the Related Tax Consequences of Buying, Holding and Selling" American Institute of CPAs Tax Forum, Orlando, FL September 12, 2018
- "An Introduction, and the Related Tax Consequences of Buying, Holding and Selling" AICPA Tax Forum, Chicago, IL August 23, 2018
- "Blockchain, Bitcoin and Cryptocurrency The Tax and Regulatory Issues" Texas Society of CPAs, Addison, TX August 13, 2018
- "International Tax Law" Texas State Bar Advanced Tax Seminar, Dallas, TX August 9, 2018
- "Cryptocurrency Taxation" Texas State Bar Advanced Tax Seminar, Dallas, TX August 9, 2018
- "International Tax Reform: The Shift Toward a 'Territorial' System" –Fort Worth Society of CPAs, Fort Worth, TX August 3, 2018
- "Tax Reform"; "The New Partnership Tax Audit Rules"; "Tax Reform and Enforcement Initiatives" Texas Society of Enrolled Agents, Houston, TX July 28, 2018
- "An Introduction to the New Partnership Audit Rules"; "Blockchain, Bitcoin and Cryptocurrency for Accountants" North Texas Society of Enrolled Agents, Dallas, TX July 14, 2018
- "Choice of Entity after Tax Reform" Dallas Bar Association, Dallas, TX –July 9, 2018
- "International Tax Update" Tax Section, Texas Bar Annual Meeting, San Antonio, TX June 22, 2018
- "What You Need to Know About Bitcoin" Bankruptcy Bench/Bar North Texas District, Dallas, TX June 8, 2018
- "International Tax Enforcement and Offshore Reporting" 34th Annual TexFed Institute, San Antonio, TX June 6, 2018
- "Cryptocurrency Tax Reporting Traps and Enforcement" 34th Annual TexFed Institute, San Antonio, TX June 6, 2018
- "The Tax Reform Act Where Are We Now?" State Bar of Texas, San Antonio, TX May 18, 2018
- "Creative Partnership/LLC Structuring Techniques After the Tax Reform Act, Including Consideration of the New 20% Deduction" – State Bar of Texas, San Antonio, TX – May 18, 2018
- "DFW: BLOCKCHAIN How Will It Shape the Future of My Business?" -Dallas, TX May 8, 2018
- "Tax Reform: What you Need to Know Now" Metroplex Practice Group -Dallas, TX April 24, 2018
- "Federal Tax Reform and IRS Enforcement Initiatives: How They Impact Your Clients" Collin County Bar Association/Small Practice Section –April 23, 2018
- "Bitcoin & Blockchain: Legal and Ethical Issues You Need to Know" State Bar of Texas April 17, 2018
- "Federal Tax Reform and IRS Enforcement Initiatives: How They Impact Your Clients" Collin County Bar Association March 16, 2018





- "Federal Tax Reform and IRS Enforcement Initiatives: How They Impact Your Clients" Dallas Practice Group Dallas, TX February 15, 2018
- "Tax Reform: What you Need to Know Now" Dallas Bar Association -Austin, TX February 13, 2018
- "Tax Reform: What You Need to Know Now" Dallas Society of CPAs -Dallas, TX February 13, 2018 (4-hour course)
- "Tax Reform: What you Need to Know Now" Dallas Bar Association -Austin, TX February 12, 2018
- "Tax Reform's Impact on Corporations and Pass-Through Entities" Texas Society of CPAs Tax Course Corpus Christi, TX February 12, 2018 (4-hour course)
- "Tax Reform's Impact on Corporations and Pass-Through Entities" Texas Society of CPAs Tax Course, San Antonio, TX February 6, 2018 (4- hour course)
- "Tax Reform's Impact on International Business" Texas Society of CPAs Tax Course, San Antonio, TX February 6, 2018
 (4-hour course)
- "Bitcoin, Blockchain and the Bank Secrecy Act"—Taxation, Regulation, and Reporting Dallas Bar Association, Dallas, TX February 5, 2018
- "Tax Reform's Impact on Corporations and Pass-Through Entities" –Texas Society of CPAs Tax Course, Fort Worth, TX February 2, 2018 (4-hour course)
- "Tax Reform's Impact on International Business" Texas Society of CPAs Tax Course, Fort Worth, TX February 2, 2018 (4-hour course)
- "Tax Reform's Impact on Corporations and Pass-Through Entities" –Texas Society of CPAs Tax Course, Dallas, TX February 1, 2018 (4-hour course)
- "Tax Reform's Impact on International Business" –Texas Society of CPAs Tax Course, Dallas, TX February 1, 2018
 (4-hour course)
- "Bitcoin and Blockchain Regulatory Issues" Practice Group Webinar, Dallas, TX January 2018
- "The New Partnership Tax Audit and Litigation Rules" American Academy of Attorney-CPAs, Austin, TX January 2018
- "What you Need to Know Now" Texas State Bar, Tax Reform: Austin, TX January 2018
- "Tax Reform's Impact on Businesses" Dallas Practice Management, Frisco, TX January 2018
- "The New Partnership Tax Audit and Litigation Rules" Austin CPA Society, Austin, TX November 2017
- "Offshore Voluntary Disclosure and Related Procedures Update" Texas State Bar International Tax Symposium Webcast November 2017
- "International Criminal Tax" Texas State Bar International Tax Symposium Dallas, TX November 2017
- "The New Partnership Tax Audit and Litigation Rules" Midland CPA Society Midland, TX November 2017
- "Blockchain, Bitcoin, and the Bank Secrecy Act Taxation, Reporting, and Regulation" Metroplex Practice Group Dallas, TX – October 2017
- "Offshore Compliance Options Overview" Texas State Bar Advanced Tax Law Course Houston, TX August 2017
- "IRS Penalties How to Get Them Abated"- ACPEN August 2017
- "Legal and Ethical Issues with Blockchain" Texas State Bar Austin, TX June 2017
- "The New Partnership Audit Rule" Texas Society of CPAs, Waco, TX May 2017
- "The FBAR: Everything You Need to Know" Convergence, Dallas CPA Society Dallas, TX May 2017
- "Leadership and Career Mapping" Dallas Regional Chamber of Commerce, Young Professionals Dallas, TX March 2017
- "What Every Family Law Attorney Should Know About Tax Law" Collin County Bar Association Family Law Section, Plano, TX February 2017
- "An Update on Tax Issues" North Texas MENSA, Dallas, TX January 2017
- "Issues in International Taxation" Dallas Practice Management Group, Dallas, TX March 2017





- "Offshore Tax Enforcement and Voluntary Compliance Programs" State Bar of Texas, International Tax Symposium Houston, TX – November 2016
- "Offshore Tax Enforcement and Voluntary Compliance Programs" State Bar of Texas, International Tax Symposium, Dallas, TX November 2016
- "Offshore Tax Enforcement and Voluntary Compliance Programs" State Bar of Texas, International Tax Symposium, Dallas, TX November 2016
- "Offshore Tax Enforcement Update" Texas State Bar Advanced Tax Law Course, Texas Law Center, Austin, TX –
 October 2016
- "Time to Pay the Piper: The New Partnership Audit Rules and the Impact on Entities of All Sizes" IRS Nationwide Tax Forum, San Diego, CA September 15, 2016
- "Time to Pay the Piper: The New Partnership Audit Rules and the Impact on Entities of All Sizes" IRS Nationwide Tax Forum, Orlando, Florida September 1, 2016
- "Understanding the Stages & Strategies in a Criminal Tax Case" AAA CPA, August 30, 2016
- "The Bank Secrecy Act & Beyond: Understanding Currency and Monetary Reporting Requirements" CPA Academy, August 25, 2016
- "International Tax and Asset Reporting Compliance for the Everyday Client" CPA Academy, August 7, 2016
- "Tax-Related Identity Theft" Fort Worth Tax Institute, Fort Worth CPA Society, August 4, 2016
- "The Nuts & Bolts of a Criminal Tax Case" Bloomberg BNA, July 27, 2016
- "International Tax" Metroplex Practice Group, Dallas, TX July 26, 2016
- "Understanding the Stages & Strategies in a Criminal Tax Case" AICPA, July 19, 2016
- "Understanding the IRS's Offshore Voluntary Disclosure Program" CPA Academy June 22, 2016
- "International Tax and Asset Reporting Compliance for the Everyday Client" CPA Academy, June 7, 2016
- "Understanding the IRS's Offshore Voluntary Disclosure Program" CPA Academy June 6, 2016
- "Understanding the IRS's Offshore Voluntary Disclosure Program" CPA Academy May 20, 2016
- "The Offshore Voluntary Disclosure Program and Related Procedures" San Angelo CPA Society, San Angelo, TX May 12, 2016
- "International Tax and Asset Reporting for the Small Tax Practitioner" AICPA (American Institute of CPAs) May 10, 2016
- "International Tax and Asset Reporting Compliance for the Everyday Client" CPA Academy, May 9, 2016
- "International Tax and Asset Reporting Compliance for the Everyday Client" CPA Academy, May 4, 2016
- "The Evolution of a Criminal Tax Case" American Bar Association Symposium, Washington, DC April 1, 2016
- "Understanding the IRS's Offshore Voluntary Disclosure Program" CPA Academy, March 18, 2016
- "International Tax and Asset-Reporting Compliance for the Everyday Client" CPA Academy Webinar, February 26, 2016
- "Bank Secrecy Act & Beyond Understanding Currency and Monetary Reporting Requirements" CPA Academy Webinar, February 12, 2016
- "Offshore Voluntary Disclosure Program" CPE in conjunction with the 2016 TSCPA Mid-Year Board Meeting, January 27, 2016
- "International Tax and Asset Reporting Compliance for the Everyday Client" CPA Academy Webinar, December 29, 2015
- "International Tax and Asset Reporting Compliance for the Everyday Client" TSCPA CPE Expo, Houston, December 11, 2015
- "Bank Secrecy Act & Beyond: Understanding Currency and Monetary Reporting Requirements" –CPA Academy Webinar, December 28, 2015



Jason B. Freeman, J.D., CPA

- "International Tax and Asset Reporting Compliance for the Everyday Client" TSCPA CPE Expo, San Antonio,
 December 8, 2015
- "The Offshore Voluntary Disclosure Program and Related Procedures" –Dallas Bar Association Tax Section, Dallas, TX -December 7, 2015
- "International Tax and Asset Reporting Compliance for the Every Day Client" TSCPA CPE Expo, Arlington, TX -December 3, 2015
- "Offshore Voluntary Disclosure Program," 2015 International Tax Symposium sponsored by the International Tax Committee
 of the Tax Section of the Texas Bar November 12 (Dallas) and November 13 (Houston)
- 17th Annual MC Taxation Conference, Dallas November 3, 2015
- "Partnership Audits & Litigation (TEFRA)" Advanced Tax Law Course sponsored by the Tax Section of the State Bar of Texas October 29, 2015
- "Offshore Voluntary Disclosure Program: An Update" The Knowledge Group Live Webcast October 28, 2015
- "The Bank Secrecy Act & Beyond" CPE Think Tank August 26, 2015
- "International Tax and Asset Reporting Compliance for the Everyday Client" CPA Academy August 25, 2015
- "The Bank Secrecy Act & Beyond: Understanding Currency and Monetary Reporting Requirements" CPA Academy August 13, 2015
- "Understanding the IRS's Offshore Voluntary Disclosure Program and Related Procedures" CPE Think July 29, 2015
- "Understanding the IRS's Offshore Voluntary Disclosure Program" CPA Academy July 27, 2015
- "International Tax for the Everyday Client" AICPA Webcast on the Voluntary Disclosure Program July 23, 2015
- "Reporting Compliance for the Everyday Client" International Tax and Asset- CPA Academy Live Webinar June 15, 2015
- "International Tax and Asset-Reporting Compliance for the Everyday Client' AICPA Practitioners Symposium & TECH Conference in partnership with the AAA Practice Management Conference & AAM Summit, Orlando, FL June 10, 2015
- "Important Criminal Tax Developments" American Bar Association Section of Taxation May Meeting Washington, DC May 9, 2015
- "Practice Standards Questions Arise for a New Client Representation" -Initiating a New Client Engagement: What Kinds of Ethical and American Bar Association Section of Taxation May Meeting, Washington, DC May 8, 2015
- "Report on Important Criminal Tax Developments" American Bar Association Section of Taxation

Previous Testimony as an Expert at Trial or Deposition (Prior Four Years)

- Clarke v. Dutton Harris & Company, PLLC, 2:20-cv-00160-JAD-BNW (Dist. Ct. Nevada)
- Niels Ulrik Oldenburg v. Marogt O. Burrell, individual and as trustee of the Margot O. Burrell Living Trust, DC-19-17313 (95th Judicial District Court, Dallas, Texas)